

CHAFFETZ LINDSEY LLP

1700 BROADWAY, 33<sup>RD</sup> FLOOR, NEW YORK, NY 10019  
MAIN: +1 212 257 6960 | FAX: +1 212 257 6950

ANDREAS FRISCHKNECHT, PARTNER  
DIRECT: +1 212 257 6965  
A. FRISCHKNECHT@CHAFFETZLINDSEY.COM

June 6, 2025

By ECF

Hon. Jeannette A. Vargas  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Greenfield SPV I, S.A.P.I. de C.V. et al. v. Comision Federal de Electricidad et al.*,  
Case No. 24-cv-06400-JAV:  
Status Update Regarding Petitioners' Efforts to Effectuate Service on Respondents

Dear Judge Vargas:

This firm represents Petitioners Greenfield SPV I, S.A.P.I. de C.V., Terminales Portuarias del Pacifico, S.A.P.I. de C.V. and Terminal Maritima de Carbon, S.A. de C.V. in this proceeding. As directed by the Court (ECF No. 14), I write to provide a status report regarding Petitioners' efforts to effectuate service on Respondents.

As set forth in Petitioners' letter dated March 5, 2025 (ECF No. 13), Petitioners seek to enforce a foreign arbitral award in the aggregate principal amount of approximately \$40 million against Respondent Comisión Federal de Electricidad (Mexico's state-owned electric utility) and its affiliate CFE Generación II EPS. As a result, service on Respondents must be completed in accordance with the Hague Service Convention (the "Convention"). Mexico does not permit service via postal channels and has deemed service through the Mexican Central Authority to be the only valid means of serving a Mexican party under the Convention.

As further advised in Petitioners' March 5, 2025 letter, Petitioners, at that time, had recently learned, unofficially, that the Mexican court tasked with effectuating service on Respondents had rejected both requests for service. Shortly thereafter, to minimize any resulting delay, Petitioners decided to commence a new effort to serve Respondents without awaiting formal confirmation from the Mexican Central Authority that their initial effort had been rejected.

On or about April 2, 2025, Petitioners, through their external vendor, again sent copies of the summons and complaint, together with the required Spanish translations, to the Mexican Central Authority by FedEx. However, the FedEx shipments were detained by Mexican customs. To expedite delivery, on or about April 16, 2025, Petitioners, through their external vendor, yet again sent copies of the same documents to the Mexican Central Authority by FedEx. Those copies were successfully delivered to the Mexican Central Authority on April 21, 2025. No further

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information concerning the Mexican Central Authority's processing of Petitioners' request for service is available at this time.

Based on the foregoing, Petitioners, pursuant to Fed. R. Civ. P. 4(m), respectfully request a further extension of the deadline for service of the Petition until September 8, 2025 for good cause shown. Petitioners stand ready to provide such further status updates as the Court may direct.

We thank the Court for its time and consideration.

Respectfully submitted,



Andreas A. Frischknecht

*Counsel for Petitioners*